

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS SIERRA,)	
)	No. 18 C 3029
<i>Plaintiff,</i>)	
)	Hon. John Z. Lee,
v.)	District Judge
)	
REYNALDO GUEVARA, <i>et al.</i> ,)	Hon. M. David Weisman,
)	Magistrate Judge
<i>Defendants.</i>)	

PARTIES' JOINT STATUS REPORT

Pursuant to the Court's order (Dkt. 193), the parties submit the following joint status report:

A. Current Deadlines/ Magistrate Referral

1. This case has been referred to Magistrate Judge Weisman for discovery supervision. Pursuant to the parties' Amended Proposed Joint Scheduling Order¹ regarding *Monell* production, the City will begin production of CRs, Investigative Files, and RD Files on a rolling basis starting September 25, 2020, occurring again on October 26, 2020, with production to be completed by November 30, 2020.

B. Progress of Discovery

2. Discovery is ongoing in this case. Since the parties last appeared for a status hearing in this case, the parties have continued to engage in written discovery and have begun taking remote depositions. The parties are continuing to

¹ Entered on June 10, 2020, by Magistrate Judge Weisman (Dkt. 196).

work to coordinate additional remote depositions of several third-party witnesses. Additionally, the parties have had initial discussions regarding taking party depositions.

C. Pending Motions

3. There are no currently pending motions in this case.

D. Settlement Efforts

4. There are no current settlement discussions in this case.

E. Agreed Schedule for the Next 45 Days

5. The parties do not believe any specific schedule need be set for the next 45 days. The parties will continue to conduct written discovery, are conferring about outstanding discovery, and are conferring about depositions that are appropriate to conduct via video.

6. There currently is no fact discovery cut off. The parties still have several party and third-party depositions to take, some of which the parties are currently working to schedule as remote video depositions. The Court has not yet set an expert discovery or dispositive motion deadline. The parties are not requesting that this Court set expert discovery or dispositive motion deadlines at this time.

F. Any Agreed Action the Court can Take Without a Hearing

7. None at this time.

G. Need for a Hearing with the Court

8. The parties do not believe a telephonic or in-person hearing with the judge is necessary at this time.

Dated: August 5, 2020

Respectfully submitted,

/s/ Sean Starr

Jon Loevy
Anand Swaminathan
Steven Art
Josh Tepfer
Sean Starr
Rachel Brady
John Hazinski
Loevy & Loevy
311 N. Aberdeen St.
Chicago, Illinois 60607
(312) 243-5900
For Plaintiff

MARK A FLESSNER

Corporation Counsel of the
City of Chicago

/s/ Eileen E. Rosen

Eileen E. Rosen
Catherine M. Barber
Theresa Berousek Carney
Austin G. Rahe
Special Assistant
Corporation Counsel
Rock Fusco & Connally,
LLC
321 N. Clark Street, Suite
2200
Chicago, Illinois 60654
(312) 494-1000
**For Defendant City of
Chicago**

/s/ Josh M. Engquist

James G. Sotos
Josh M. Engquist
Jeffrey R. Kivetz
David A. Brueggen
Samantha J. Pallini
Special Assistant
Corporation Counsel
The Sotos Law Firm, P.C.
141 W. Jackson, Suite
1240A
Chicago, Illinois 60604
(630) 735-3300
**For Defendants JoAnn
Halvorsen, as Special
Representative for the
estate of Ernest
Halvorsen, Wojcik,
McMurray, Figueroa,
and Biebel**

/s/ Thomas M.

Leinenweber

Thomas M. Leinenweber
James V. Daffada
Kevin E. Zibolski
Special Assistant
Corporation Counsel
Leinenweber Baroni &
Daffada, LLC
120 N. LaSalle Street,
Suite 2000
Chicago, Illinois 60602
(312) 663-3003
**For Defendant
Guevara**

CERTIFICATE OF SERVICE

I, Sean Starr, an attorney, hereby certify that on August 5, 2020 I caused the foregoing Joint Status Report to be filed using the Court's CM/ECF system, thereby effectuating service on all counsel of record.

/s/ Sean Starr
Attorney for Plaintiff